

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

RICHARD PAK,

Defendant.

No. 1:19-cr-57 (LO)



CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about 2010, and continuing thereafter until in or about May 9, 2019, in Fairfax County, Virginia, in the Eastern District of Virginia, the defendant, RICHARD PAK, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with other persons, both known and unknown to the grand jury, to commit the following offenses:

(1) to unlawfully, knowingly, and intentionally distribute 500 grams or more of a mixture and substance containing of a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(2) to unlawfully, knowingly, and intentionally distribute 100 kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(3) to unlawfully, knowingly, and intentionally distribute a mixture and substance containing a detectable amount of tetrahydrocannabinol (THC), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (2);

(4) to unlawfully, knowingly, and intentionally lease, rent, use, and maintain a place for the purpose of distributing and using controlled substances, in violation of Title 21, United States Code, Section 856;

(5) to unlawfully, knowingly, and intentionally distribute controlled substances to persons under the age of twenty-one, in violation of Title 21, United States Code, Section 859;

(6) to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to violate the provisions of Title 21 of the United States Code, including Title 21, United States Code, Sections 841, 856, 859, and 860; and to unlawfully, knowingly, and intentionally employ, hire, use, persuade, induce, and entice persons under 18 years of age to assist in avoiding detection for any such offense, all in violation of Title 21, United States Code, Section 861; and

(7) to unlawfully, knowingly, and intentionally sell drug paraphernalia and to use the mails and other facilities of interstate commerce to transport drug paraphernalia, that is, devices for use in compounding, converting, concealing, producing, processing, preparing, ingesting,

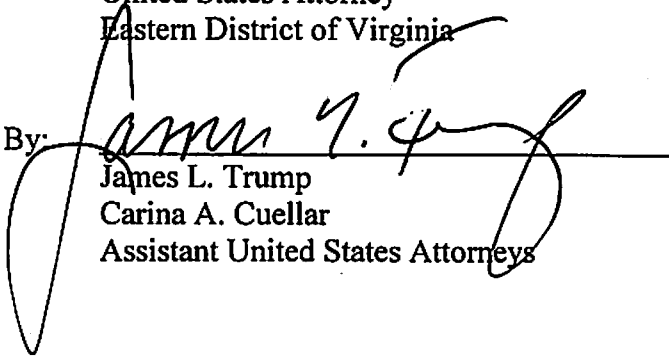
inhaling, or otherwise introducing into the human body unlawful controlled substances,
including THC and marijuana and products derived from marijuana, in violation of Title 21,
United States Code, Section 863.

All in violation of Title 21, United States Code, Section 846.

G. Zachary Terwilliger

United States Attorney
Eastern District of Virginia

By:


James L. Trump
Carina A. Cuellar
Assistant United States Attorneys